

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	CASE NO: 2:19-cr-53
	:	
v.	:	CHIEF JUDGE EDMUND A. SARGUS, JR.
	:	
ANDREW K. MITCHELL,	:	
	:	
Defendant.	:	

JOINT MOTION OF DEFENDANT AND U.S. GOVERNMENT
TO CONTINUE ALL TRIAL DEADLINES

Now comes Defendant, Andrew K. Mitchell, by and through counsel Mark C. Collins, and Assistant U.S. Attorney Kevin Kelley, who hereby request a continuance of all deadlines. Defendant continues to waive time for stated request. The reasons for said request are more fully stated in the attached Memorandum in Support.

Respectfully submitted,

/s/ Mark C. Collins

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Attorneys for Defendant Andrew K. Mitchell

MEMORANDUM IN SUPPORT

Now comes the Defendant, Andrew K. Mitchell, by and through Counsel and Assistant U.S. Attorney Kevin Kelley, and hereby request a continuance of all deadlines. As the Court is aware, Defense Counsel has been retained on Mr. Mitchell's state case; 19 CR 1662, a murder charge, set in front of the Honorable Judge Young, in the Common Pleas Court of Franklin County, as well as the above styled case. It is Counsel's belief that it is in Mr. Mitchell's best interest to focus on one matter at a time; that being the murder charge in the state case. Defendant by and through Counsel hereby again waives speedy trial rights in the above styled case.

As the Court is aware, Defense Counsel and the Assistant United States Attorney met with the Court on Friday, March 13, 2020. Defense Counsel and the Assistant United States Attorney formally move to continue the instant matter currently set before this Honorable Court on March 30, 2020, past August 31, 2020, the date of the trial for the State case. Based on interests of justice, said request is consented and joined by Assistant U.S. Attorney Kevin Kelley.

Respectfully submitted,

/s/ Mark C. Collins

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Attorneys for Defendant Andrew K. Mitchell

CERTIFICATE OF SERVICE

I hereby certify that on March 17, 2020, I electronically filed the Motion to Continue with Chief Judge Edmund A. Sargus, Jr., using the CM/ECF System, which will send notification of such filing to the following: Kevin W. Kelley, Esq.

/s/ Mark C. Collins

MARK C. COLLINS (0061207)